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4 | IN PRO PER

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

2:23-cv-04669-MEMF(MARx)

9 TAYLOR THOMSON,  
10 Plaintiff and Counterclaim Defendant  
11 vs.  
12 ASHLEY RICHARDSON,  
13 Defendant and Counterclaim Plaintiff

Case No.: 2:23-cv-04699-MEMF-MAR

MOTION TO COMPEL DEPOSITION OF TAYLOR  
THOMSON AND REQUEST FOR SANCTIONS

TO THE HONORABLE COURT AND ALL PARTIES:

Ashley Richardson respectfully moves this Court for an order compelling the deposition of Taylor Thomson and imposing sanctions due to her repeated failure to appear or agree to definitive dates for her properly noticed deposition. In support of this motion, Ashley Richardson states as follows:

## I. INTRODUCTION

This motion arises from Taylor Thomson's continued evasion of her deposition despite multiple properly served notices. Her failure to appear has significantly delayed discovery and impacted Ms Richardson, who believes that Ms. Thomson will never voluntarily appear and, even if she did, would assert her Fifth Amendment privilege against self discrimination. This motion seeks an order compelling her to appear and requesting appropriate sanctions for her multiple failures to comply to date. Ms Thomson wishes to

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1 delay this proceeding indefinitely in order to avoid facing trial and the ultimate judgement that will be entered  
2 against her.

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4 II. RELEVANT FACTS  
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6 1. On September 6 2025, Ashley Richardson served a Notice of Deposition upon Taylor  
7 Thomson for a deposition scheduled on October 16, 2025 A true and correct copy of the Notice of Deposition  
8 is attached as Exhibit A.

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10 2. Taylor Thomson failed to appear for the deposition and did not provide any justification.

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12 3. A second Notice of Deposition was served on January 17, 2025 rescheduling the deposition  
13 for March 26, 2025. A true and correct copy is attached as Exhibit B. Again, Taylor Thomson's council once  
14 again has noted Taylor Thomson will fail to appear due to their client residing outside of the United States, but  
15 have once again failed to offer any alternative dates.

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17 4. Ms Richardson has made multiple attempts to confer with Ms Thomson's counsel, but no  
18 meaningful response was received. Once Ms Thomson is deposed, Ms Richardson is prepared to try this case,  
19 which is precisely why Ms Thomson has no intention of ever appearing.

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21 III. LEGAL ARGUMENT  
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1                   Under [Relevant Rule of Civil Procedure, e.g., Rule 37 of the Federal Rules of Civil  
2 Procedure], when a party or witness fails to appear for a properly noticed deposition without justification, the  
3 court may compel their attendance and impose sanctions. Courts have consistently held that a deponent's  
4 failure to comply with deposition notices warrants judicial intervention.

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6                   Here, Ms Thomson has ignored multiple deposition notices and has failed to provide any  
7 justification for their nonappearance. Her counsel has refused to agree to a firm date. Ms Thomson's refusal to  
8 comply with her discovery obligations is obstructing the litigation process and warrants an order compelling  
9 her deposition.

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#### IV. REQUEST FOR SANCTIONS

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14                   Ms Richardson also requests that the Court impose sanctions against Taylor Thomson for her  
15 willful failure to appear, including but not limited to:

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18                   1. Monetary sanctions covering the costs of the missed depositions, including location fees  
and court reporter fees.

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21                   2. An order precluding Taylor Thomson from introducing testimony or evidence at trial as a  
consequence of their noncompliance.

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25                   3. Any further relief the Court deems just and appropriate.

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1 V. CONCLUSION  
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7 For the foregoing reasons, Ashley Richardson respectfully requests that the Court issue an  
8 order:  
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11 1. Compelling Taylor Thomson to appear for a deposition at a time and date set by the Court.  
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13 2. Imposing sanctions as appropriate.  
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16 DATED: February 28, 2025  
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21 Respectfully submitted,  
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24 Ashley Richardson  
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3 Dated February 28, 2025.

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Ashley Richardson  
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